Global Staff Applicant Privacy Notice

Issued: 16th May 2018

1. Introduction

Expedia, Inc., together with its affiliates, ("Expedia", "we" or "us") has issued this Global Staff Applicant Privacy Notice to describe how we handle personal information that we hold about our staff member applicants (referred to as "you"). The term "staff member" includes those who work on a non-permanent basis and includes volunteers, agents, independent contractors, interns, temporary and casual workers.

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Notice sets out the personal information that we collect and process about you, the purposes of the processing and the rights that you have in connection with it. In the event of any inconsistency between your applicable law and this Notice, your applicable law will prevail.

If you are in any doubt regarding the applicable standards, have any comments or questions about this Notice or would like to see a copy of our Staff Privacy Notice, please contact us at the contact details in Section 10 below.

2. Types of personal information we collect

When making an application for employment at Expedia, we may process personal information about you that has been provided to us.

The types of personal information we may process include, but are not limited to:

- Identification data: civil/marital status; first and last name; photograph; date and place of birth; nationality and country of citizenship and visa details, if applicable.
- Contact details: address; telephone number (fixed and mobile); email address.
- Employment details: employment history; current job; company name; grade; geographic location.
- Academic and professional qualifications: degrees; titles; skills; language proficiency; training information.

Sensitive personal information may include any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, health ("Sensitive Personal Information"). In certain jurisdictions social security numbers or financial information may be considered Sensitive Personal Information and so will be treated accordingly. As a general rule, we try not to collect or process any Sensitive Personal Information about you, unless authorized by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes:

- Race and ethnicity may appear indirectly on photos and other information available on passports and national IDs, which are necessary to comply with local immigration laws and for employee travel management. However, race/ethnicity are not processed purposefully.
- Trade union membership may be collected but only where permitted and for the purposes defined under Applicable Privacy Law(s).

In such circumstances we shall ensure that such Sensitive Personal Information is collected and processed in accordance with applicable laws.

We also may collect information from third parties or public sources. For example, before and/or during your application to Expedia, we may conduct background screenings through a third-party vendor and collect information about your past education, employment, credit and/or criminal history, as allowed by applicable law. Additionally, if
there is an investigation of a matter that occurred outside of our offices, we may obtain information about the incident from witnesses who may include private parties, law enforcement or public sources like news sources.

3. **Purposes for processing personal information**

We may process your personal information for the following purposes:

- Management of internal and external hiring process across the different group entities; selecting and scheduling meetings with potential new hires; communicating with staff member applicants; and
- Verification via background screening (if applicable) through a 3rd party vendor, which validates highest degree obtained, current and previous employers. If applicable, you will be notified that a background screen is to be run as a pre-employment qualification when you apply for a position and during the conversation with the recruiter.

Expedia may omit your details from the shortlist for a role where you have indicated that you do not have a legal right to work in the country of application. Such a process may be automated and thus lead to you not being considered for the role in question.

4. **Who we share your personal information with**

We may share your personal information with the following recipients or categories of recipients:

- Expedia personnel with authorized access and on a need-to-know basis only (including direct managers, senior management, office management and human resources teams);
- Expedia group entities;
- Third party service providers appointed by and acting on behalf of Expedia. For example, some personal information will be available to third party companies who provide us with employee applicant selection / vetting services;
- Business associates and other professional advisers;
- The recipient’s Legal Department;
- Any person (natural or legal) or organisation to whom Expedia may be required by applicable law or regulation to disclose personal information, including law enforcement authorities, central and local government.
- Other third parties as necessary for the following purposes: to establish, exercise or defend against potential, threatened or actual litigation; to protect the vital interests of another person; in connection with the sale, assignment or other transfer of all or part of our business; or with your consent.

5. **Legal basis for processing personal information (EEA staff member applicants only)**

If you are a staff member applicant in the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (i.e. to administer an application relationship with us), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.
If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at Section 10 below.

6. Transfer of personal information abroad

As we operate at a global level, we may need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. Expedia has in place a group wide global data transfer agreement including the EU standard contractual clauses for transfers of personal information from the European Economic Area to a country outside it, such as the United States. If you wish to obtain a copy of this global data transfer agreement please contact us at the contact details in Section 10 below.

7. Data retention periods

Personal information will be stored in accordance with applicable laws and kept as long as required in order to carry out the purposes described in this Notice or as otherwise required by applicable law. If you are an unsuccessful staff member applicant located in the EEA, we will retain your personal information for a reasonable period following the outcome of your application. We may retain your personal information for longer where you have requested to be considered for other roles. For further information on our data retention periods please contact us using the details in Section 10 below.

8. Your data privacy rights

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws which include the right: (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure if your personal information is inaccurate, no longer necessary in relation to the purposes for which it was collected, or is being unlawfully processed; (iii) to restrict or object to the processing of your personal information; and (iv) if applicable, to portability of your personal information.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

You also have a right to lodge a complaint with your local data protection authority (DPA) about our collection and use of your personal information. For more information, please contact your local DPA.

To make any such requests, please use the contact details at Section 10 below. We will consider and act upon any such requests in accordance with applicable data protection laws.

9. Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you on the recruitment site and indicate at the top of the Notice when it was most recently updated. We encourage you to check back at this website periodically in order to be aware of the most recent version of this Notice.

10. Contact details

Please address any questions or requests relating to this Notice to your recruiter or alternatively, you can raise any concerns with our Global Privacy Director via privacy@expedia.com.